Cal/EPA Environmental Justice Action Plan

Pilot Project Proposal Summary for
Illegal Drug Lab Risk Reduction Project

February 4, 2005

I. **Lead Agency**: Department of Toxic Substances Control (DTSC)

II. **Area Proposed:** A community of within the city of Hayward *or* Oakland.

Area Demographics:

Hayward
43% white; 11% African-American; 19% Asian; 34.2% Latino; 25% under the age of 18; Median household income: $51,000; Below poverty level: 7.2%

Oakland
31% white; 36% African-American; 15% Asian; 22% Latino; 25% under the age of 18; Median household income $44,000; below poverty level: 19%

III. **Background:** Approximately 1,200 "clandestine" or illegal drug labs are seized each year by law enforcement agencies. These labs, which manufacture the drug methamphetamine, typically use a variety of illegal and dangerous substances. The State and (to a lesser extent) the Federal government, provide support to law enforcement officials by removing the visible signs of these substances from the dwelling (often homes, apartments or motel rooms) where the lab operated. The "gross" contamination is then removed by qualified professionals and disposed according to the waste's characteristics. What remains in the dwelling is unknown; however, sufficient information exists to indicate that the permanent features of a dwelling, such as the wallboard, flooring, ventilation and septic systems may remain contaminated with substances which may continue to pose a risk to occupants. The majority of these illegal drug labs are located in communities where the residents do not have the financial resources or the political influence to effectively address this problem.

DTSC proposes to explore a number of possible approaches which could dramatically reduce exposure, especially to children, to possible remaining contaminants. Children are the focus of this proposal because of their proximity to contaminated surfaces such as floor coverings, their prolonged duration of exposure, and children may be more sensitive and susceptible to some of the remaining chemicals. Children who subsequently live in these dwellings may be exposed to chemicals such as ammonia, phosphine, hydrogen chloride, red phosphorous, methamphetamine and other caustic substances. These chemicals present a variety of potential health problems.

IV. Project Start Date: May 2005

V. Project End Date: December 2006

VI. Goal & Objectives:

a. Goal: Identify cost-effective approaches to reduce residual contamination from illegal drug labs which may be present in a dwelling after the "gross" contamination has been removed.

b. Objectives:

- Identify the extent of the remaining contamination to a specific number of contaminants associated with drug lab activity which may pose the greatest threat to children.
- Implement and test the effectiveness of possible approaches to reduce or eliminate the remaining contamination.
- Provide a written description of the most effective approach identified, including a step-by-step explanation of the materials and methods.
- Ensure statewide availability of this information via printed materials and the Internet.

VII. Activities – Planning, Implementation, Evaluation, & Deliverables

Planning

- **Site Selection:** DTSC examined its database of illegal drug lab removal activities and identified five cities (Antioch, Hayward, Oakland, Oakley, and San Jose) with the greatest number of seizures reported in the nine Bay Area counties. From this list, DTSC Public Participation staff considered and identified the cities of Hayward and Oakland to be of the communities which faced the greatest number of environmental challenges, have a history of community activism and current existence of organizations within the community to respond to environmental concerns.

- **Reduction of Risk to Children's Health:** It is likely that the greatest exposure to residual contamination in illegal drug labs is to children. Children are likely to come into contact with contaminated surfaces such as, carpeting, wall boards, and furniture, more often than adults. Children may spend a greater part of their day in the drug lab dwelling.

  It is difficult to measure the actual health effects from these contaminants because there may be a number of other environmental factors, both inside and outside the home, that also pose potential health risks. Thus, DTSC will measure the actual reduction in the level of contamination for the specific contaminants identified.

- **Cal/EPA Cross-Media Implication:** Reducing contamination associated with direct contact to illegal and dangerous drug lab chemicals may lead to the ability to address other routes of exposure such as, inhalation through heating and cooling systems. Impacts to community waste-water treatment facilities contaminated through the drug lab structure sewage connections could also be explored. DTSC will work with other Cal/EPA Boards, Departments, and Office to identify cross-media opportunities as the project proceeds.

- **Partnerships:** DTSC will work collaboratively with the local Environmental Health Department and the County Medical Officer. Community support is critical to ensure building owner/tenant participation as well as acceptance and implementation of the project's recommendations.

Implementation

- **Methodology & Performance Indicators:** DTSC will develop an approach to analyze a finite number of contaminants at illegal drug labs. This activity will take place after the gross removal of contamination using state or federal resources. Based on this information, various approaches will be implemented and their effects measured to identify if a cost-effective means of reducing the level of residual contamination remaining on solid surfaces exists.

- **Public Participation:** If approved, DTSC will conduct focused workshops in the proposed cities (Hayward and Oakland). Community and local government participation will be requested. DTSC will select one of the communities based upon potential support expressed through the workshops for the project. The project plan will then be revised to reflect the focus of the selected community.

- **Project Work Plan & Timeline:**

	Activity	Start Date	End Date
Phase 1	**1. Identify pilot project location(s)**	**1st Qtr 2005**	**1st Qtr 2005**
	2. Define project parameters	**1st Qtr 2005**	**1st Qtr 2005**
Phase 2	**1. Collect project data**	**2nd Qtr 2005**	**Ongoing**
	2. Identify project data gaps	**3rd Qtr 2005**	**4th Qtr 2005**
	3. Establish Local Advisory Groups (LAGs)	**3rd Qtr 2005**	**4th Qtr 2005**
Phase 3	**1. Develop Children's Environmental Risk Reduction Plan (ChERRP)**	**4th Qtr 2005**	**1st Qtr 2006**
Phase 4	**1. Implement ChERRP**	**1st Qtr 2006**	**1st Qtr 2006**
Phase 5	**1. Evaluate ChERRP**	**3rd Qtr 2006**	**4th Qtr 2006**
	2. Explore implementation options of project	**4th Qtr 2006**	**4th Qtr 2006**

Evaluation & Deliverables

- **Results**: While it is not possible within the timeframe of the project to demonstrate an improvement in the health of the community due to a reduction in exposure to contaminants associated with illegal drug labs, DTSC will measure specific contaminant reductions. The availability of this data along with the specific steps to achieve this reduction will be beneficial to the many other communities struggling with the presence of contaminated housing and other structures.

- **Deliverables:** This project should lead to two deliverables:

  - **Identification of remaining levels of contamination in structures where clandestine drug activities have previously taken place; and**
  - **A cost-effective approach to reduce these levels.**

- **Considerations, Anticipated Challenges/Constraints:** Several states in the nation have attempted to develop standards for drug lab cleanups. These efforts have been extremely difficult and time consuming resulting in no known health-based standards. This project takes a different approach and views success as a significant reduction in the levels of contamination, rather than compliance with a cleanup level which has been established as health protective.

VIII. For More Information:

Comments, Questions, or Concerns regarding this Pilot?

Please direct comments, questions, or concerns to:

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